

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a Delaware corporation,)	
)	
)	Case No. 16-cv-1054(WMW/DTS)
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL INSURANCE COMPANY, an)	
Indiana corporation, and ACE AMERICAN)	
INSURANCE COMPANY, a Pennsylvania)	
corporation,)	
)	
Defendants.)	

JOINT MOTION REGARDING CONTINUED SEALING

Documents have been filed under temporary seal in connection with the following motion:

Plaintiff's Letter Brief to Magistrate Judge Schultz (Dkt. No. 271)

Plaintiff's Letter Brief to Magistrate Judge Schultz (Dkt. No. 275)

Defendant's Letter Brief to Magistrate Judge Schultz (Dkt. No. 278)

Pursuant to Local Rule 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
272	N/A	Exhibit A to Plaintiff's Letter Brief to Magistrate Judge Schultz requesting a full response to FICO's Request for Production Nos. 89-90.	(a) The parties agree this document shall remain sealed. (b) None. (c) None.		This document should remain sealed. This exhibit was filed under seal to protect Federal's commercially confidential information, which appears throughout the exhibit. This commercial information has been designated Attorneys' Eyes Only under a protective order issued in this case (Dkt. No. 44) and should remain sealed.
275	N/A	Plaintiff's Response Letter Brief to Magistrate Judge Schultz requesting a full response to FICO's Request for Production Nos. 89-90.	(a) The parties agree this letter shall remain sealed. (b) None. (c) None.		This letter should remain sealed. This letter was filed under seal to protect Federal's commercially confidential information, which appears throughout the letter. This document contains excerpts and quotations from documents designated Attorneys' Eyes Only under a protective order issued in this case (Dkt. No. 44) and should remain sealed.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
275-1	N/A	Exhibit C to Plaintiff's Response Letter Brief to Magistrate Judge Schultz requesting a full response to FICO's Request for Production Nos. 89-90.	(a) The parties agree this document should remain under seal. (b) None. (c) None.		This document should remain sealed. This exhibit was filed under seal to protect Federal's commercially confidential information, which appears throughout the exhibit. This commercial information has been designated Confidential - Attorneys' Eyes Only under a protective order issued in this case (Dkt. No. 44) and should remain sealed.
275-2	N/A	Exhibit D to Plaintiff's Response Letter Brief to Magistrate Judge Schultz requesting a full response to FICO's Request for Production Nos. 89-90.	(a) The parties agree this document should remain under seal. (b) None. (c) None.		This document should remain sealed. This exhibit was filed under seal to protect Federal's commercially confidential information, which appears throughout the exhibit. This commercial information has been designated Confidential - Attorneys' Eyes Only under a protective order issued in this case (Dkt. No. 44) and should remain sealed.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
275-3	N/A	Exhibit E to Plaintiff's Response Letter Brief to Magistrate Judge Schultz requesting a full response to FICO's Request for Production Nos. 89-90.	(a) The parties agree this document should remain under seal. (b) None. (c) None.		This document should remain sealed. This exhibit was filed under seal to protect Federal's commercially confidential information, which appears throughout the exhibit. This commercial information has been designated Confidential - Attorneys' Eyes Only under a protective order issued in this case (Dkt. No. 44) and should remain sealed.
278	N/A	Defendant's Response Letter Brief to Magistrate Judge Schultz requesting a full response to FICO's Request for Production Nos. 89-90.	(a) The parties agree this letter shall remain sealed. (b) None. (c) None.		This letter should remain sealed. This letter was filed under seal to protect Federal's commercially confidential information, which appears throughout the letter. This document contains excerpts and quotations from documents designated Attorneys' Eyes Only under a protective order issued in this case (Dkt. No. 44) and should remain sealed.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
278-1	N/A	Exhibits 1-4 and 6 to Defendant's Response Letter Brief to Magistrate Judge Schultz requesting a full response to FICO's Request for Production Nos. 89-90.	(a) The parties agree Exhibits 1-4 and 6 should remain under seal. (b) None (c) None.		Exhibits 1-4 and 6 in this document should remain sealed. The exhibits were filed under seal to protect Federal's commercially confidential information, which appears throughout the exhibit. This commercial information has been designated Attorneys' Eyes Only and Highly Confidential Attorneys' Eyes Only under a protective order issued in this case (Dkt. No. 44) and should remain sealed.

Dated: May 9, 2019

MERCHANT & GOULD P.C.

/s/ Heather Kliebenstein

Allen Hinderaker, MN Bar # 45787
Heather Kliebenstein, MN Bar # 337419
Michael A. Erbele, MN Bar # 393635
Joseph Dubis, MN Bar # 0398344
MERCHANT & GOULD P.C.
3200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402-2215
Tel: (612) 332-5300
Fax: (612) 332-9081
ahinderaker@merchantgould.com
hkliebenstein@merchantgould.com
merbele@merchantgould.com
jdubis@merchantgould.com

Attorneys for Plaintiff FICO

-AND-

s/ Christopher D. Pham

Terrence J. Fleming (#0128983)
tfleming@fredlaw.com
Lora M. Friedemann (#0259615)
lfriedemann@fredlaw.com
Leah C. Janus (#0337365)
ljanus@fredlaw.com
Christopher D. Pham (#0390165)
cpham@fredlaw.com
FREDRIKSON & BYRON, P.A.
200 South Sixth Street, Suite 4000
Minneapolis, MN 55402-1425
(612) 492-7000 (tel.)
(612) 492-7077 (fax)

Attorneys for Defendants